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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

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**VIDEO SOFTWARE DEALERS and
ENTERTAINMENT SOFTWARE
ASSOCIATION,**

No. C 05 4188 RMW RS

DECLARATION OF SONYA BRADY

Date: May 12, 2006

Time: 9:00 a.m.

Courtroom: 6

Before the Honorable Ronald M. Whyte

20 ARNOLD SCHWARZENEGGER, in his
21 official capacity as Governor of the State of
22 California; BILL LOCKYER, in his official
23 capacity as Attorney General of the State of
24 California; GEORGE KENNEDY, in his
25 official capacity as Santa Clara County
District Attorney; RICHARD DOYLE, in his
official capacity as City Attorney for the City
of San Jose, and ANN MILLER RAVEL, in
her official capacity as County Counsel for
the County of Santa Clara.

Defendants.

Case No. C 05 4188 RMW RS

DECLARATION OF SONYA BRADY

1 I, Sonya Brady, declare:

2 1. I am a postdoctoral fellow in the Health Psychology Program at the
 3 University of California, San Francisco. I received a Ph.D. from the University of Pittsburgh in
 4 Clinical and Biological Health Psychology in 2005. A true and correct copy of my curriculum
 5 vitae is attached hereto as Exhibit A. I make this declaration in opposition to plaintiffs' motion
 6 for summary judgment. I know the following facts of my own knowledge, and if called as a
 7 witness, could testify competently thereto.

8 2. My research interests include examining the mechanisms through which
 9 stressful life circumstances (violence exposure and poverty) may lead to greater harmful health
 10 behaviors in adolescence, as well as protective factors that may promote resiliency. In the past
 11 year, I have had three peer reviewed articles regarding violence (both real and media) accepted
 12 for publication. Of relevance to this proceeding is a study entitled "Effects of Media Violence on
 13 Health-Related Outcomes Among Young Men" co-authored Karen A. Matthews and me and
 14 published this month in the *Archives of Pediatric Adolescent Medicine*.

15 3. The objectives of the study, as summarized in the abstract, were "to test the
 16 effects of media violence exposure on blood pressure, negative affect, hostile social information
 17 processing, uncooperative behavior, and attitudes toward health risk behaviors among young men
 18 varying in lifetime violence exposure within the home and community." Results are described as
 19 follows: "Men randomly assigned to play *Grand Theft Auto III* exhibited greater increases in
 20 diastolic blood pressure from a baseline rest period to game play, greater negative affect, more
 21 permissive attitudes toward using alcohol and marijuana, and more uncooperative behavior in
 22 comparison with men randomly assigned to play *The Simpsons: Hit and Run*. Only among
 23 participants with greater exposure to home and community violence, play of *Grand Theft Auto III*
 24 led to elevated systolic blood pressure in comparison with play of *The Simpsons*." Additional
 25 results described in the published study showed that among those young men with greater
 26 exposure to community violence, play of *Grand Theft Auto III* led to greater likelihood that study
 27 participants thought they would be accused of cheating in a test scenario in comparison to play of
 28 *The Simpsons*.

1 4. The study's conclusions were as follows: "Media violence exposure may
2 play a role in the development of negative attitudes and behaviors related to health. Although
3 youth growing up in violent homes and communities may become more physiologically aroused
4 by media violence exposure and make more hostile attributions for others' actions subsequent to
5 media violence exposure, all youth appear to be at risk for potentially negative outcomes."

6 5. I would summarize the study in laymen's terms as follows. We, the
7 researchers, used a sample of 100 college-aged men to participate in this laboratory experiment.
8 We assigned each participant to play either *Grand Theft Auto III* (a very violent game) or *The
9 Simpsons: Hit and Run* (a not-very-violent game). The researchers monitored the participants'
10 blood pressure during game play. After the participants were done playing, each participant
11 filled out standard questionnaires designed to measure attitudes toward marijuana and alcohol use
12 and the participant's current negative emotions. Participants rated the likelihood that they would
13 be accused of cheating after viewing a videotaped test scenario and being asked to identify with a
14 student in the video. Participants also played a game in which they could cooperate or compete
15 with another person. We found that participants who played *Grand Theft Auto III* exhibited
16 increased blood pressure, more negative emotions and uncooperative behavior, and more
17 permissive attitudes toward marijuana and alcohol use than did the participants who played *The
18 Simpsons* game. Among those participants who grew up in violent homes or communities, play
19 of *Grand Theft Auto III* led to more pronounced increases in blood pressure and to more hostile
20 thought patterns in comparison with play of *The Simpsons*.

21 6. We noted that our study is the first to "show that media violence is
22 associated with permissive attitudes toward health risk behaviors that do not directly involve
23 hostility or aggression." We also found that participants who had higher levels of exposure to
24 real life violence in their homes or communities were particularly susceptible to increases in
25 blood pressure during media violence exposure and to hostile thought patterns subsequent to
26 media violence exposure. However, all youth exposed to media violence appear to be at risk for
27 potentially negative outcomes.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed on April ___, 2006 at _____, California.
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5 Sonya Brady
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